

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Kimball Area Public Schools,  
Independent School District No. 739,

Civil Case No. 23-CV-02637 (NEB/LIB)

Plaintiff/ Counterclaim Defendant,

**JOINT MOTION FOR  
CONTINUED SEALING OF DOCS.  
125, 125-1, AND 125-2**

v.

I.R.M., by and through his Parent,  
L.M.,

Defendants/ Counter Claimants.

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As required by Local Rule 5.6(d)(2), the Parties, jointly and through undersigned counsel, move the Court to keep under seal documents filed in connection with Counterclaim Defendant's Motion for Summary Judgment (Doc. 120).

The documents include:

Doc. 125: Sealed Exhibit 6 to the Declaration of William Seiler in Support of Counterclaim Defendant's Motion for Summary Judgment.

Doc. 125-1: Sealed Exhibit 7 to the Declaration of William Seiler in Support of Counterclaim Defendant's Motion for Summary Judgment.

Doc. 125-2: Sealed Exhibit 9 to the Declaration of William Seiler in Support of Counterclaim Defendant's Motion for Summary Judgment.

Doc. 125 is the deposition transcript of Counterclaim Defendant's Elementary Principal, Joel Timmerman. Doc. 125-1 is the deposition transcript of Counterclaim Plaintiff L.M. The transcripts contain private educational data on non-parties to this case, private personnel data, and private medical information. Doc. 125-2 is a number of select pages of notes taken by Counterclaimant L.M. while serving as handler for Counterclaimant I.R.M.'s service animal. The notes contain private educational data on non-parties to this case and private personnel data. The Court's Protective Order (Doc. 73) classifies the information in Docs. 125, 125-1, and 125-2 as confidential and provides that should filing become necessary, such information will be filed under seal.

Due to the sensitive nature of this information and the impracticability of redacting each document for unsealed filing, the Parties ask the Court to keep these documents under seal through final disposition of the case or until the Court rules otherwise.

**[SIGNATURE PAGE FOLLOWS]**

**SQUIRES, WALDSPURGER &  
MACE, P.A.**

DATE: July 17, 2025

/s/Elizabeth J. Vieira

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KIMBALL AREA PUBLIC  
SCHOOLS**

DATE: July 17, 2025

**SCHOOL LAW CENTER, LLC.**

/s/ Amy J. Goetz

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AND L.M.**